

April 12, 2023

*via EM/CF*

Jones  
Law Firm P.C.

The Honorable Jennifer L. Rochon  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl Street, Courtroom 20B  
New York, NY 10007

**Re: Short Discovery Extension in SDNY Case No. 21-cv-01803,  
*Coker v. Goldberg & Associates P.C.***

Dear Judge Rochon:

I write today to respectfully request the Court allow an additional three days to produce substantial and meaningful responses to opposing counsel's Discovery requests, currently due tomorrow, April 13, 2023. We will be able to reply fully by Monday, April 17, 2023.

Our client, Ms. Julie Goldberg, has only recently resumed full-time work since her medical leave. Ms. Goldberg did not have a chance to thoroughly review the Discovery requests until earlier this week, on Monday, April 10, 2023, despite the demands being sent to her by our office on April 6, 2023. Ms. Goldberg has, in addition, been preparing for arguments in three separate customs hearings and two federal cases this week. Due to these extraordinary circumstances, we believe it is reasonable to request the Court to grant us an additional weekend to complete our discovery responses.

In addition to the circumstances described in my prior letter, my office has had a substantial turnover in the past few weeks, leading to this delayed request. Defendants intend to fully comply with Plaintiff's demands, but respectfully request a small amount of additional time to do so completely.

Respectfully,



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Attorneys for Defendants

Defendants' request is GRANTED. Defendant shall complete all discovery no later than **April 17, 2023**. Defense counsel is reminded to inform their client regarding the potential for sanctions if discovery is not fully produced by April 17, 2023. Plaintiff shall file her letter updating the Court with a proposed summary judgment schedule on **April 20, 2023**.

Dated: New York, New York SO ORDERED  
April 12, 2023

  
JENNIFER L. ROCHON  
United States District Judge